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Subject: Farm Bill 2007 Official Comments - 12/29/2005 12:59 PM CST

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zipcode: 03049 Question1: Question2: Question3:

Question4: Thank you for providing the opportunity to comment on the reauthorization of the Farm Bill. As you are aware, Farm Bill conservation programs like the Wildlife Habitat Incentives Program, Wetland Reserve Program, Environmental Quality Incentives Program, Forest Legacy and others have been extremely useful in improving conservation on private farm and forestlands. These voluntary, incentive-based programs provide the framework for "win-win" solutions for farmers, forestland owners, and the public. Given their often tight profit margins, farmers and forestland owners benefit from additional income from these programs while the public benefits by having better water quality and quantity, improved soil quality and wildlife habitat, and more land for outdoor recreation.

The New England Chapter of The Wildlife Society strongly supports the reauthorization of all conservation programs at funding levels that will keep them strong and successful. If appropriately funded, these programs can greatly assist states in achieving fish and wildlife conservation objectives, and in implementing strategies of state Wildlife Action Plans, while also promoting and protecting agricultural and forestland production.

Even though these programs have been highly successful, there are a number of ways in which these programs could be modified to improve their effectiveness.

- 1)Make wildlife a coequal priority with soil and water conservation in all phases of farm bill programs. Although wildlife is often cited at the national level as a program goal, wildlife does not always get incorporated into program implementation at the state level (e.g. EQIP). Wildlife is a public resource just like soil and water. As such, wildlife should have the same weighting as soil and water conservation in program eligibility requirements and prioritizing projects for implementation across the country.
- 2)State NRCS offices should make every effort to enter into technical assistance agreements with state fish & wildlife agencies. State fish & wildlife agencies have the statutory authority to manage fish and wildlife resources. They have trained staff with the expertise to assist landowners with planning and implementing habitat projects that will have the most benefit for wildlife. To increase the likelihood of these agreements, the 2007 Farm Bill should significantly reduce the 50% non-federal match requirement to enter into these agreements. At a time when most state fish & wildlife agencies in the country are facing budget shortfalls in the near future, it is nearly impossible for most

of them to meet the current match requirement, and thus meaningfully provide their expertise in collaboration in these programs.

Additionally, a greater percentage of Financial Assistance monies should be allowed to provide technical assistance in support of these programs.

- 3)Authorize NRCS to have at least two years to obligate funds. Currently state NRCS offices need to obligate funds during the fiscal year that they are appropriated. Appropriations are often handed down 2-3 months into the fiscal year, and unobligated funds are taken in April and transferred to other states to ensure all funds are used. Quite literally, NRCS offices have only 6-7 months to obligate millions of dollars. This meager time frame does not allow for adequate, thoughtful planning at both the program and project level, especially given existing staffing levels.
- 4)Remove program barriers that prohibit forestland owners from being eligible for assistance. Although the 2002 Farm Bill language does include non-industrial private forestland among eligible lands in most conservation programs, forestlands are not always eligible at the state level. For instance, New Hampshire is the only state in the Northeast that allows forestlands to be enrolled in EQIP. Being that the Northeast is nearly 70% forested, it is imperative that these types of enrollment barriers at the state level be removed.
- 5)Create and authorize funding for a program that provides for cooperative and collaborative monitoring and evaluation of conservation programs. In recent years, more and more politicians have been asking questions such as, ?Are Farm Bill Conservation Programs working? Are they accomplishing prescribed goals?? Answering these questions would require science-based monitoring programs at regional and national levels. Yet, under current policies, no Farm Bill monies can be expended to monitor program success.
- 6)Consider creating a program or modifying an existing program to include the protection of important upland habitats similar in function to CRP. CRP and GRP already help to conserve and protect important grasslands habitats. However, there are many other significant upland habitats that would benefit from a similar program. In New England, these habitats could include wintering areas and significant mast producing forest stands, among others.

Farm Bill conservation programs are very important for helping to conserve New England?s fish and wildlife resources. By strengthening funding levels and modifying program policies, these programs can go even further towards maintaining healthy fish and wildlife populations well into the future.

Sincerely,

James D. Oehler Chapter President Question5: Question6: